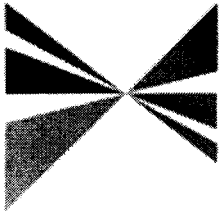


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March 10, 2006

Mr. Barry Sedlik
Undersecretary, Business, Transportation, and Housing Agency
State of California
980 9th Street, Suite 2450
Sacramento, CA 95814

RE: Southern California Comments on State Goods Movement Action Plan Phase II Progress Report

Dear Mr. Sedlik:

The following comments on the State's draft Goods Movement Action Plan Phase II progress report are submitted by SCAG on behalf of the staff of the Los Angeles County Metropolitan Transportation Authority and San Bernardino Associated Governments, as well as SCAG.

First and foremost, we thank you for your efforts to create a much-needed state-level action plan for goods movement. We commend the Governor's leadership, the leadership of the Secretaries, and the immense amount of work the staff is doing on this effort. In addition, we appreciate that the draft action plan contains many urgently needed measures to control emissions and reduce public health impacts.

As you may recall, the Community Impact Mitigation and Workforce Development working group met in December and developed a set of recommendations, or a protocol, for how to ensure effective community input on mitigation of impacts. We appreciate that the new Draft Framework reflects some of the elements of this protocol. We support the concept that Community Advisory Committees be established for key goods movement projects (ref. page I-7), as long as it is also recognized that other forms of outreach and collaboration may be more appropriate and effective for certain types of projects, particularly those that are smaller in scope and scale (e.g. individual railroad grade crossing projects, truck climbing lane projects, etc.). Our outreach efforts are typically tailored to the unique circumstances of each project and to the needs and interests of the surrounding communities. This flexibility is critical to the success of each outreach effort and the wise use of taxpayer dollars.

We also note that some projects that have not undergone environmental review, such as the new and expanded near-dock intermodal facilities, are included in the list of short term projects (page I 4). It would be more appropriate to show these projects as Environmental Studies in the short-term, as was done on the same

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page for the I-710, unless there is substantial likelihood that the project can begin construction within the short term timeframe. An update from project sponsors would be useful, and we would be willing to assist in that process.

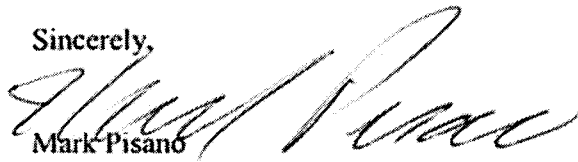
We recommend that the regional transportation plan, the related air quality management plan, and supporting planning and programming activities be the processes on which the state relies in developing the overall statewide framework for goods movement. Through these regional planning processes, consistent performance criteria are applied in the development and selection of the optimal goods movement system. Individual projects should be viewed as components of the goods movement system and evaluated for their performance as a system. The regional process is able to consider and analyze phasing and prioritization issues associated with delivery of these complex systems in far greater detail than a statewide plan, and appropriately evaluate projects in the context of an overall system. In this regard, we request that two principles be added to the list of 22 principles in the Draft Framework for Action:

- The State Goods Movement Action Plan should rely on regional efforts to identify and reach consensus on goods movement and air quality improvement strategies, including the establishment of regional priorities and phasing based on performance criteria defined at the state level.
- Investment in goods movement infrastructure and air quality improvements should be commensurate with the impact of goods movement on each region, as determined using performance criteria defined at the state level.

These principles will help to clarify the relationship between regional and state goods movement action plans, and underscore the need for proportionality between infrastructure/mitigation investment and the impact of goods movement on particular regions.

Thank you again for the opportunity to provide comments on the State Goods Movement Action Plan Phase II progress report and we hope to continue to work cooperatively in the future with you to address this critically important issue.

Sincerely,



Mark Pisano
Executive Director

cc: Mr. Will Kempton, Caltrans
Mr. Roger Snoble, Metro
Mr. Tony Grasso, SANBAG